

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK.

RAHUL MANCHANDA,

Plaintiff,

No. 18 Civ. 11092 (PGG)

- against -

NICOLE MATTIES, NICOLA SHAPIRO, DOUGLAS SENDEROFF, ROGER BLANK, AARON MINE, DANIEL POWELL, MATT O'BUCK, SHARIE O'BUCK, KATE BOSE, NEW YORK FBI, NYPD, JOE HENDRIX, ANDRE DE CASTRO, JAMIE WOZMAN, MARK ANESH, COREY COHEN, A. MICHAEL FURMAN, and PAULA ASHCRAFT,

STIPULATION OF  
DISMISSAL WITH  
PREJUDICE

Defendants.

WHEREAS, on or about October 14, 2018, Plaintiff Rahul Manchanda ("Plaintiff") filed a complaint in the Supreme Court of New York, County of New York, Index No. 101501/2018 ("NYS Supreme Court Action"), naming Nicole Matties, Nicola Shapiro, Douglas Senderoff, Roger Blank, Aaron Mine, Daniel Powell, Matt O'Buck, and Sharie O'Buck as defendants;

WHEREAS, on or about October 24, 2018, Plaintiff filed a second amended complaint in NYS Supreme Court Action, adding the Federal Bureau of Investigation (improperly named as NY FBI) (the "FBI") and the NYPD as defendants;

WHEREAS, on or about October 31, 2018, Plaintiff filed a third amended complaint in the NYS Supreme Court Action, adding Joe Hendrix and Andre de Castro as defendants (the "Third Amended Complaint");

WHEREAS, on or about November 28, 2018, the FBI removed the Third Amended Complaint to the Southern District of New York, No. 18 Civ. 11092 (the "Federal Action"), and filed a Notification of Removal in the NYS Supreme Court Action;

WHEREAS, on or about November 28, 2018, Plaintiff filed a Fourth Amended Complaint (Dkt. Nos. 2, 5, 6) in the Federal Action, which Plaintiff had filed in the NYS Supreme Court Action, adding Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, and Paula Ashcraft as defendants (the "Fourth Amended Complaint");

WHEREAS, counsel for Defendants FBI, Roger Blank, Aaron Mino, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, have appeared in the Federal Action;

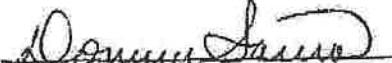
WHEREAS, no party hereto is an infant or incompetent person for whom a committee or guardian has been appointed;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, his counsel, and counsel for Defendants FBI, Roger Blank, Aaron Mino, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, that:

I. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff voluntarily dismisses the Federal Action with prejudice, which includes all underlying complaints filed in the NYS Supreme Court Action, with each party to bear its own fees and costs

2. This stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement. Facsimiles of signatures shall constitute acceptable, binding signatures for purposes of this agreement.

DOMINIC SARNA, ESQ.

By: 

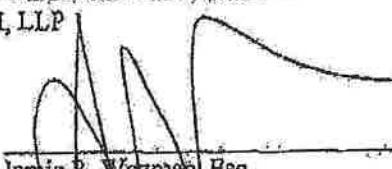
Dominic Sarna, Esq.  
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FURMAN, KORNBLUM & BRENNAN LLP

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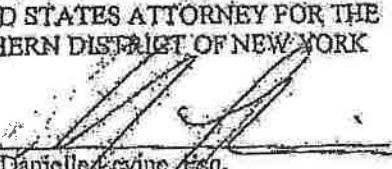
Corey M. Cohen, Esq.  
Attorneys for Defendants  
ROGER BLANK, COREY COHEN, and  
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LEWIS BIRSBOS BISGAARD &  
SMITH, LLP

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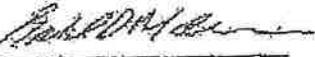
Jamie R. Wozman, Esq.  
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GEOFFREY S. BERMAN  
UNITED STATES ATTORNEY FOR THE  
SOUTHERN DISTRICT OF NEW YORK

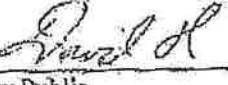
By: 

Danielle Levine, Esq.  
Attorneys for Defendants  
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Danielle.Levine@usdoj.gov

I, Plaintiff Rahul Manchanda, have reviewed the instant Stipulation of Dismissal with Prejudice and have had an opportunity to discuss the same with my attorney, Dominic Sarnia. I agree to all language herein, including the agreements set forth in Paragraphs 1 and 2 of this Stipulation of Dismissal with Prejudice.

  
By: Plaintiff Rahul Manchanda

Sworn to before me this  
15 day of January, 2019

  
Notary Public

DAVID HAMILTON  
NOTARY PUBLIC STATE OF NEW YORK  
No. QT1HAB352552  
Qualified in Queens County  
My Commission Expires 01-03-2021

SO ORDERED:

  
Honorable Paul G. Gardephe